

RETURN DATE: SEPTEMBER 19, 2017

STATE OF CONNECTICUT
EX REL GEORGE JEPSEN,
ATTORNEY GENERAL

: SUPERIOR COURT

v.

:
: JUDICIAL DISTRICT OF HARTFORD
:

EDDIE ALBERTO PEREZ
& MARIA A. PEREZ

: AUGUST 31, 2017

COMPLAINT

This is an action under Conn. Gen. Stat. §1-110 et seq. seeking the revocation or reduction of the pension of a state or municipal employee who has been convicted of a crime related to state or municipal office. In particular, the complaint seeks the revocation or reduction of the pension of Defendant EDDIE ALBERTO PEREZ who served as Mayor of the City of Hartford, Connecticut from December 4, 2001 through June 25, 2010, for the reasons pleaded below.

I. THE PARTIES

1. The plaintiff is the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT. The Attorney General is expressly authorized by virtue of Conn. Gen. Stat. §1-110a(a) to bring actions such as this with respect to public officials and/or state or municipal employees who are convicted of or plead guilty or nolo contendere to any crime related to state or municipal office.

2. (a) Defendant EDDIE ALBERTO PEREZ is a natural person residing in Hartford, Connecticut.

(b) Defendant MARIA A. PEREZ is a natural person residing in Hartford, Connecticut. Defendant MARIA A. PEREZ is the wife of defendant EDDIE ALBERTO PEREZ. Defendant MARIA A. PEREZ is named as a defendant since she may claim an interest in her husband's pension benefits.

II. CAUSE OF ACTION — REVOCATION OR REDUCTION OF PENSION

3. During the period of time from December 4, 2001 through June 25, 2010 Defendant EDDIE ALBERTO PEREZ served as Mayor of the City of Hartford, Connecticut.

4. Defendant EDDIE ALBERTO PEREZ'S service as Mayor of the City of Hartford, Connecticut constituted service as a "public official" within the meaning of Conn. Gen. Stat. §1-110(1).

5. Defendant EDDIE ALBERTO PEREZ'S service as Mayor of the City of Hartford, Connecticut also constitutes service as a "state or municipal employee" within the meaning of Conn. Gen. Stat. §1-110(2).

6. Defendant EDDIE ALBERTO PEREZ is entitled to pension benefits by virtue of his service as Mayor of the City of Hartford, Connecticut.

7. Defendant EDDIE ALBERTO PEREZ was convicted of the following crimes: one count each of Bribe Receiving, in violation of Conn. Gen. Stat. §53a-148a, and Attempted Larceny in the First Degree by Extortion, in violation of Conn. Gen. Stat.

§§53a-49(a)(2), 53a-122(a)(2). These convictions are reflected in the following two cases on file in the Superior Court for the Judicial District of Hartford: (1) *State of Connecticut v. Eddie Alberto Perez*, #HHD-CR09-0628569-T; and (2) *State of Connecticut v. Eddie Alberto Perez*, #HHD-CR09-0635038-T.

8. Each of the charges for which Defendant EDDIE ALBERTO PEREZ was convicted constituted a “crime related to state or municipal office” within the meaning of Conn. Gen. Stat. §1-110(3).

9. Defendant EDDIE ALBERTO PEREZ was a public official and/or state or municipal employee who was convicted of crimes related to state or municipal office.

DEMAND FOR RELIEF

WHEREFORE, pursuant to Conn. Gen. Stat. §§1-110a, the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT, requests the following relief:

1. Revocation and/or reduction of any pension to which Defendant EDDIE ALBERTO PEREZ is entitled on account of his service as a public official and/or state or municipal employee;
2. Such other relief as is just and equitable to effectuate the purposes of this action.

Dated at Hartford, Connecticut, this 31st day of August, 2017.

STATE OF CONNECTICUT

BY: GEORGE JEPSEN
ATTORNEY GENERAL

/s/ Robert B. Teitelman
Robert B. Teitelman (Juris # 085053)
Assistant Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120
Tel. (860) 808-5040/ Fax (860)808-5391
e-mail: robert.teitelman@ct.gov